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August 1, 2003

Via Hand Delivery

Marlene H. Dortch

Secretary

Federal Communications Commission

445 12th Street, SW

Washington, D.C. 20554

Re: Highland Cellular, LLC
E911 Interim Report

Dear Ms. Dortch:

Highland Cellular, LLC ("HCL") hereby files its E911 Interim Report regarding its wireless Enhanced 911 (E911) deployment and implementation status. HCL recognizes the public safety importance of Phase II E911 service. HCL provides wireless service in rural West Virginia and currently operates on a TDMA network, but is in the process of deploying a GSM network. Hence, it will ultimately transition its TDMA subscribers to the GSM network.

As set forth below, HCL provides its responses to the information requested by the Wireless Telecommunication Bureau in its Public Notice released June 30, 2003 (Public Notice, DA 03-2113, Wireless Telecommunications Bureau Provides Further Guidance on Interim Report Filings by Small Sized Carriers).

1. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid).

HCL has received six Phase I requests and six Phase II requests. It has encountered problems deploying Phase I service in Mercer County, WV due to a delay in connectivity. It anticipates resolving the problem by August 1, 2003. HCL also anticipates a delay in meeting the Phase II requirements because of slow responses from equipment vendors, backhaul upgrades required, deployment timelines and financial constraints.

2. **The carrier's specific technology choice (*i.e.*, network-based or handset-based solution, as well as the type of technology used).**

At this time, HCL is still evaluating whether to use a network-based or handset based solution for its GSM network. As the Commission is aware, GPS-enabled handsets are not currently available. Further, because of the rural nature of HCL's service area, a network-based technology may not be fully functional. Specifically, HCL believes a network-based solution will not be able to meet the Commission's accuracy and reliability requirements.

3. **Status on ordering and/or installing network equipment.**

HCL has not begun to order the necessary network equipment. HCL anticipates the following problems: lack of available backhaul from cell sites, accuracy of data, power availability, and integration.

4. **If the carrier is pursuing a handset-based solution, the Report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets.**

As stated above, HCL has not committed to an ALI-technology. Nonetheless, GPS-enabled handsets are not available in GSM systems to timely meet the Commission's E911 requirements.

5. **The estimated date on which Phase II service will first be available in the carrier's network.**

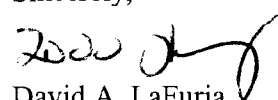
HCL estimates that Phase II service will first be available in its network by June, 2005.

6. **Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005.**

HCL anticipates being able to meet the December 31, 2005 deadline.

In the event you have any questions with respect to this matter, please contact the undersigned.

Sincerely,



David A. LaFuria
Todd Slamowitz

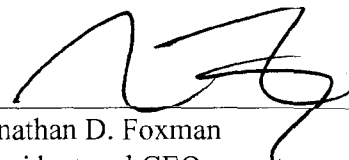
A F F I D A V I T

County of Raleigh)
) SS:
State of WV)

I, Jonathan D. Foxman, having been first duly sworn, depose and state as follows:

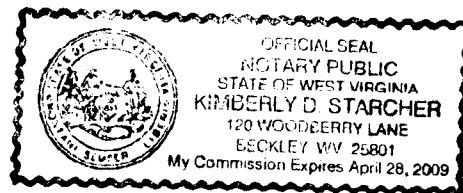
1. I am President and CEO for Highland Cellular, LLC.
2. I am familiar with the facts contained in the foregoing Interim Report of the status of Enhanced 911 Phase II compliance, and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct.


Jonathan D. Foxman
President and CEO
Highland Cellular, LLC

Subscribed to and sworn to before me
this 31 day of July, 2003.


Notary Public



My commission expires: April 28, 2009

CERTIFICATE OF SERVICE

I, Steven McCord, an employee in the law offices of Lukas, Nace, Gutierrez & Sachs, Chartered, do hereby certify that I have on this 1st day of August, 2003, delivered a copy of the foregoing Enhanced 911 Tier III Interim Report to the following:

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Federal Communications Commission
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Washington, D.C. 20554

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Enforcement Bureau
Federal Communications Commission
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Washington, D.C. 20554

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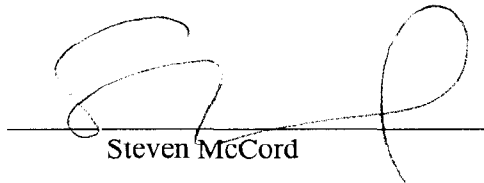
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Steven McCord

*via hand-delivery